

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

Thaddius Intravaia, *et al.*,

Plaintiffs,

v.

National Rural Electric Cooperative  
Association, *et al.*,

Defendants.

Case No. 1:19-cv-00973-LO-IDD

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT**

PLEASE TAKE NOTICE that Plaintiffs Thaddius Intravaia and Steven Marvik will and hereby do move this Court for an Order: (1) certifying the proposed Settlement Class; (2) preliminarily approving the Settlement; (3) approving the proposed Settlement Notices; (4) scheduling a final approval hearing; and (5) granting such other relief as set forth in the accompanying Proposed Preliminary Approval Order.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Brock Specht and exhibits thereto, the Declarations of Thaddius Intravaia and Steven Marvik and exhibits thereto, the Parties' Settlement Agreement, and all files, records, and proceedings in this matter. Defendants do not oppose the motion as parties to the Settlement agreement.

Respectfully Submitted,

Dated: July 31, 2020

/s/ Gregg C. Greenberg  
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***COUNSEL FOR PLAINTIFFS***

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 31, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ Gregg C. Greenberg  
Gregg C. Greenberg